



THE STATE OF WYOMING

GOVERNOR

Mark Gordon

*Public Service Commission*

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September 12, 2019

The Honorable Neil Chatterjee, Chairman  
The Honorable Richard Glick, Commissioner  
The Honorable Bernard L. McNamee, Commissioner  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

RE: Request that FERC move Docket  
AD18-7 to a High Priority

Dear Commissioners:

The Wyoming Public Service Commission (WPSC) has been monitoring FERC's efforts related to grid reliability and resilience since the Secretary of Energy submitted a Notice of Proposed Rulemaking in September, 2017. While FERC determined that rulemaking was not appropriate, it opened docket AD18-7 to "holistically examine the resilience of the bulk power system". As part of the proceeding, FERC directed ISO/RTOs to respond to a series of questions regarding resilience. On March 8, 2018, FERC issued an order granting further time to consider responses to those questions, as well as other stakeholder comments.

It has been nearly two years since the Secretary of Energy submitted a Notice of Proposed Rulemaking and twenty months since AD18-7 was opened.

In the meantime, substantial baseload retirements, especially coal-fired units, and the evolution of the electric power sector are bringing increased attention to grid resilience and fuel security. Nationwide, 40 percent (126,000 megawatts (MW)) of the nation's coal fleet has retired or announced plans to retire. By the end of 2020,

some 67,000 MW of coal-fired generating capacity in ISO/RTO footprints will have retired. This total includes more than 10,000 MW that have announced intentions to retire this year and in 2020. The four ISO/RTO regions with the most coal retirements through 2020 are PJM (36,200 MW), MISO (14,800 MW), ERCOT (5,800 MW) and SPP (5,000 MW).

In addition, 20 percent of nuclear units (21 of 105) have retired or announced plans to retire by 2030, amounting for more than 17,000 MW of capacity.

While we appreciate FERC's efforts to examine challenges related to the reliability and resilience of the bulk power system, we are not aware of any further action, other than soliciting comments, the Commission has taken with respect to AD18-7.

I am writing on behalf of the WPSC to urge the FERC to expedite consideration of AD18-7. Please contact me at the number or email address provided on this letterhead.

Thank you for your prompt consideration of our request.

Sincerely,



Kara B. Fornstrom, Chairman

cc: Governor Mark Gordon  
Commissioner Mary A. Throne  
Commissioner Mike Robinson